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December 8, 2021

**VIA ECF AND FED EX**

The Honorable Jessica S. Allen, U.S.M.J.  
United States District Court for the District of New Jersey  
Martin Luther King Jr. Bldg. & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

**Re: Jason Jorjani v. New Jersey Institute of Technology, et al.,  
Civil Action No. 2:18-cv-11693 (WJM/JSA)**

Dear Judge Allen:

This firm represents Defendants in connection with the above-referenced matter. We write on behalf of the parties because the December 3, 2021, deadline for Plaintiff's counsel to send Defense counsel a letter identifying specific deposition objections which Plaintiff's counsel believes were improper has passed without Plaintiff's counsel being able to provide that letter. Given Plaintiff's counsel's personal circumstances, we believed it best to reach out to him and seek to resolve this issue collegially.

To that end, we have confirmed with Plaintiff's counsel that the revised schedule in the next paragraph is acceptable to him. Notably, we have also been forced to extend the dates for this firm to respond due to the long-standing, prepaid holiday travel plans of counsel, and the traditional closure of NJIT over the winter academic break.

The Parties thus jointly propose the following amended schedule if the Court is amenable to it:

- Plaintiff's counsel to advise in writing by **12/13/2021** of specific deposition objections, if any that Plaintiff's counsel submits were improperly raised;
- Defense counsel's deadline to respond is extended to **01/07/2022**;
- The parties shall meet and confer by **01/10/2022** in a good faith attempt to resolve the issues;
- On or before **01/12/2022**, the parties shall submit a joint status letter of three pages or less double spaced, confirming whether they have resolved this dispute and/or addressing what, if any, unresolved disputes remain; and

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- All other deadlines and directives set forth in the Court's 11/17/2021 Order, (DE #88), shall remain in effect.

If this schedule meets with Your Honor's approval, we request that Your Honor "so order" this letter, and the parties will be guided accordingly.

We thank the Court for its consideration. Should Your Honor or Your Honor's staff have any questions, we are always available.

Respectfully submitted,

*/s/ Marc D. Haefner*

Marc D. Haefner

cc: All Counsel of Record (via ECF and email)

\*Granted. So Ordered.

s/Jessica S. Allen  
United States Magistrate Judge

Dated: December 10, 2021